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## COOKIE POLICY For users of this website

The following information is provided to the user in compliance with the provision of the Italian Authority for the protection of personal data of May 8<sup>th</sup>, 2014 "Identification of simplified methods for the information and acquisition of consent for the use of cookies" and by the subsequent "Guidelines on cookies and other tracing instruments" of the 10<sup>th</sup> of June 2021.

### DATA CONTROLLER

The Wilde S.r.l.  
Via Alessandro Manzoni n. 38, 20121, Milano (MI)  
E-mail: [privacy.milan@thewilde.com](mailto:privacy.milan@thewilde.com)

### WHAT ARE COOKIES?

Cookies are small text strings that a website can send, during navigation, to your device (be it a PC, a notebook, a smartphone, a tablet; they are usually stored directly on the browser used for navigation). The same website that transmitted them can then read and record cookies that are on the same device to obtain various types of information. Which ones? For each type of cookie there is a clearly defined role.

### HOW MANY TYPES OF COOKIES ARE THERE?

There are three basic macro-categories, with different characteristics: technical cookies (which are subsequently divided between necessary or navigational cookies and functional cookies), analytics (or statistical cookies) and profiling cookie.

Technical cookies are generally necessary for the correct functioning of the website and to allow navigation; without them you may not be able to view pages correctly or use certain services. For example, a technical cookie is essential to keep you logged in throughout your visit to a website, or to store your language settings, display settings, etc. Technical cookies can be further distinguished into:

- navigation cookies, which guarantee the normal navigation and use of the website (allowing, for example, to make a purchase or authenticate to access reserved areas);
- functionality cookies, which allow the user to navigate according to a series of selected criteria (for example, language, products selected for purchase) in order to improve the service provided to the user;

There are, also, the following categories of cookies:

- analytics cookies, which can be assimilated to the technical ones only whenever they are used directly by the website controller to collect data in an aggregated form, on the number of user and how these users navigate through the website, and also whenever there are the necessary prerequisites specifically requested by the afore mentioned guidelines;
- Profiling cookies are more sophisticated! These cookies have the purpose of profiling the user and are used to send promotional messages in line with the user's preferences, as they are expressed by her/his actions during web surfing.

**Profiling and analytics cookies, not assimilable to the technical ones**, can also be called or classified as non-technical cookies.

Cookies can also be categorized as:

- session cookies, which are deleted immediately when you close your browser;
- persistent cookies, which - unlike session cookies - remain within the browser for a certain period of time. They are used, for example, to recognize the device that connects to the site and facilitate authentication operations for the user;
- first-party cookies, i.e., cookies generated and managed directly by the operator of the website on which the user is browsing.
- Third-party cookie, which are generated and managed by parties other than the operator of the website on which the user is browsing (usually by virtue of a contract between the owner of the website and the third party). Third party cookies can also include the profiling cookies (or the non-technical ones in general) mentioned and described before (for these types of cookies, read what has been said above, also with reference to the preemptive acquisition of the free consent). Concerning third party cookies, you can have more detailed information and

updates on their usage and their retention period in the specific informational pages published by the third party, which You can access by specific links, inserted in the description of the single cookies listed below.

## WHAT KIND OF COOKIES DO WE USE?

The chapter below lists, for every technical and assimilated cookie, the name, the purpose, and the retention period.

### THIRD PARTY COOKIES

During the course of the website navigation, the User could be subjected to third party cookies from different websites of web servers (a.k.a. third-party cookies, as described before).

Such cookies are directly managed by Controllers different from the one of this website.

You can find more information about the usage of each cookie by accessing the link posted below.

The chapter below lists each third-party cookie present in this website, including its name, the purpose, the type of cookie, the third party which use and manage the cookie and thus that process the data, and also the link to the third party's website from which You can revoke the consent or to learn how to revoke consent.

Cookie's name	Purpose	Type of cookie (Analytics or Profiling or another type attributable to technical cookies)	Third Party that sets and manages the cookies and thus that collects the user's data	Link for accessing the third party's privacy policy
__stripe_mid	Stripe fraud prevention and detection	Technical/necessary	Stripe	<a href="https://stripe.com/gb/legal/cookies-policy">https://stripe.com/gb/legal/cookies-policy</a>
__stripe_sid	Stripe fraud prevention and detection	Technical/necessary	Stripe	<a href="https://stripe.com/gb/legal/cookies-policy">https://stripe.com/gb/legal/cookies-policy</a>
m	Determines the device used to access the website. This allows the website to be formatted accordingly.	Technical/necessary	Stripe	<a href="https://stripe.com/gb/legal/cookies-policy">https://stripe.com/gb/legal/cookies-policy</a>

Finally, listed below are the links to the most popular browser, where you can find information about the settings to disable the memorization or to cancel the already memorized cookies on the browser:

- [Internet Explorer](#)
- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Apple Safari](#).

### Notice concerning children under 14 years old

Children under 14 cannot provide personal data to The Wilde S.r.l. will not be in any way responsible for any collection of personal data, as well as false statements, provided by the minor, and in any case, if you notice its use, the Controller will facilitate the right of access and cancellation forwarded by the legal guardian or by those who exercise parental authority.

### Changes and updates

This privacy policy presents its date of last update in its heading.

The Wilde S.r.l. could modify or implement changes to the privacy policy also as a consequence of future legislative changes or amendments.

## LEGAL REFERENCES ABOUT THE DATA SUBJECT'S RIGHTS

### Article 15

#### Right of access by the data subject

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.
3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.
4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

#### **Article 16**

##### **Right to rectification**

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

#### **Article 17**

##### **Right to erasure ('right to be forgotten')**

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
- (c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- (d) the personal data have been unlawfully processed;
- (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- (f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
- (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- (e) for the establishment, exercise or defense of legal claims.

#### **Article 18**

##### **Right to restriction of processing**

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;
- (d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

#### **Article 19**

##### **Notification obligation regarding rectification or erasure of personal data or restriction of processing**

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed,

unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

## **Article 20**

### **Right to data portability**

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where: (a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and (b) the processing is carried out by automated means.
2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

## **Article 21**

### **Right to object**

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.
6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

## **Article 22**

### **Automated individual decision-making, including profiling**

1. The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
2. Paragraph 1 shall not apply if the decision: (a) is necessary for entering into, or performance of, a contract between the data subject and a data controller; (b) is authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or (c) is based on the data subject's explicit consent.
3. In the cases referred to in points (a) and (c) of paragraph 2, the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.
4. Decisions referred to in paragraph 2 shall not be based on special categories of personal data referred to in Article 9(1), unless point (a) or (g) of Article 9(2) applies and suitable measures to safeguard the data subject's rights and freedoms and legitimate interests are in place.